

1 **SAO**

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Attorneys for Defendant

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 TIMOTHY THURTLE,

13 Defendant.

**CASE NO.: 2:24-cr-00229-APG-NJK**

**STIPULATION TO CONTINUE  
HEARING RE: REVOCATION OF  
PRETRIAL RELEASE**

**FIRST REQUEST**

14 **IT IS HEREBY STIPULATED AND AGREED,** by and between  
15 SIGAL CHATTAH, ESQ., Interim United States Attorney, and LAUREN IBANEZ, ESQ.,  
16 Assistant United States Attorney, counsel for the United States of America, and  
17 ERICK M. FERRAN, ESQ., counsel for Defendant TIMOTHY THURTLE, that the Revocation  
18 of Pretrial Release Hearing date in the above-captioned matter, currently set for April 21, 2025, at  
19 1:00 p.m., be continued for at least seven (7) days or to a time convenient to this Honorable Court.

20 This stipulation is entered into for the following reasons:

- 21 1. Defense Counsel has a scheduling conflict and will be in a Family Court Trial in the  
22 Eighth Judicial District Court, County of Clark, State of Nevada during the same  
23 scheduled time as the hearing set in the above captioned matter.
- 24 2. Defense Counsel and Assistant United States Attorney are currently in negotiations.
- 25 3. Defendant Thurtle is currently in the custody of the United States Marshals and does  
26 not object to the continuance.
- 27 4. All parties involved agree to the continuance.
- 28 5. This is the first request for a continuance of hearing.

1           6. Denial of this request for continuance would result in a miscarriage of justice.

2           7. This request for a continuance is made in good faith and is not intended to delay the  
3           proceedings in this matter.

4           8. For all the above-stated reasons, the ends of justice would be best served by a  
5           continuance of the hearing date.

6           DATED this 18<sup>TH</sup> day of April 2025.

7  
8           /s/ Erick M. Ferran, Esq.  
9           ERICK M. FERRAN, ESQ.  
            *Counsel for Defendant Thurtile*

/s/ Lauren Ibanez, Esq.  
            LAUREN IBANEZ, ESQ.  
            *Assistant United States Attorney*

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 vs.

6 TIMOTHY THURTLIE,

7 Defendant.

CASE NO.: 2:24-cr-00229-APG-NJK

ORDER TO CONTINUE HEARING  
RE: REVOCATION OF PRETRIAL  
RELEASE

8 **FINDINGS OF FACT**

9 Based on the pending Stipulations of the parties, and good cause appearing therefore, the  
10 Court finds that:

- 11 1. Defense Counsel has a scheduling conflict and will be in a Family Court Trial in the  
12 Eighth Judicial District Court, County of Clark, State of Nevada during the same  
13 scheduled time as the hearing set in the above captioned matter.
  - 14 2. Defense Counsel and Assistant United States Attorney are currently in negotiations.
  - 15 3. Defendant Thurtle is currently in the custody of the United States Marshals and does  
16 not object to the continuance.
  - 17 4. All parties involved agree to the continuance.
  - 18 5. This is the first request for a continuance of hearing.
  - 19 6. Denial of this request for continuance would result in a miscarriage of justice.
  - 20 7. This request for a continuance is made in good faith and is not intended to delay the  
21 proceedings in this matter.
  - 22 8. For all the above-stated reasons, the ends of justice would be best served by a  
23 continuance of the hearing date.
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**CONCLUSIONS OF LAW**

1. The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a speedy trial, since the failure to grant said continuance would be likely to result in a miscarriage of justice, would deny the parties herein sufficient time and the opportunity within which to be able to prepare for trial effectively and thoroughly taking into account the exercise of due diligence.
2. This request for a continuance is made in good faith and is not intended to delay the proceedings in this matter.
3. For all the above-stated reasons, the ends of justice would be best served by a continuance of the trial date.

**ORDER**

**IT IS ORDERED** that the hearing currently scheduled to commence on April 21, 2025, at the hour of 1:00 p.m., regarding Defendant's Revocation of Pretrial Release is continued.

**IT IS FURTHER ORDERED** that the hearing regarding Defendant's Revocation of Pretrial Release in this matter be scheduled for the \_\_\_\_ day of \_\_\_\_\_, at \_\_\_\_ am/pm.

**DATED** this \_\_\_\_ day of \_\_\_\_\_, 2025.

\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE